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Mr. Howard Trindall, Plant Manager VanTran Electric Corporation VanTran Electific Solicians 1550 VanTran Avenue
Vandalia, Illinois 62471

Dear Mr. Trindall:

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Attached is a copy of the report on our November 12, 1975 inspection of the VanTran Electric Corporation facility in Vandalia, Illinois. Our observation of the handling and disposal of PCBs at your facility indicates that the following precautions should be employed to prevent the possible loss of PCBs to the environment:

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- Containment structures such as dikes or curbs should be placed around PCB storage and work areas.
- Accumulations of PCB fluids should be promptly removed from the outside of drums and other equipment after the transfer of the fluids to transformers.
- 3. Waste paints, thinners, and other equipment should not be stored in PCB drums which have not been cleaned unless you intend to dispose of such wastes as PCBs.
- Wastes contaminated with PCBs such as rags and absorbent material should be separated from other wastes and disposed of in a landfill which has been specifically approved for this purpose by the State. The operator of the landfill which receives these wastes from your facility should have been issued a supplementary permit for disposal of PCB contaminated wastes by the Illinois Environmental Protection Agency. Additional information concerning the issuance of these supplementary permits can be obtained from Mr. Michael Rapps at the Illinois EPA office in Springfield. Illinois whose telephone number is (217) 782-6760.

The presence of a yard drain to a ditch at your facility is also noted in the report. We understand that flow in the ditch would discharge to a stream. If this drain receives storm water runoff which is contaminated by PCBs. you must apply for an NPDES permit for the discharge from this system in accordance with regulations promulgated in the Federal Register on March 13, 1976 (41 FR 11303). Furthermore, the U.S. EPA has determined that storm water discharges contaminated with PCBs should be treated by settling, oil/water separation, filtration, and activated carbon adsorption to reduce the concentration of PCBs to 10 parts per billion or less.

Within 30 days of receipt of this letter, please submit any evidence you may have that the storm water received by the yard drain mentioned in the report or any other drain on your property is not contaminated with PCBs. The best evidence would be an analytical determination of PCBs in the storm water runoff from your property although evidence that past and present practices cannot be reasonably expected to have contaminated the runoff would also be appropriate. In addition, we would appreciate your response concerning our recommendations for precautions in the handling and disposal of PCBs. If the operator of the disposal site which receives your PCB contaminated wastes has a supplementary permit for PCB disposal from the Illinois EPA, please include the number of that permit. Please refer any questions you may have to Robert Pearson or Howard Zar, members of my staff whose telephone number is (312) 353-1472.

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Very truly yours, Original signed by David Kee

> David Kee, Acting Director Enforcement Division

cc: Ronald Barganz, Illinois EPA Has for the state of an interest of the state of the stat

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